



Notice of Service of Process

LDD / ALL
Transmittal Number: 19869043
Date Processed: 05/29/2019

Primary Contact: Heather McClow
Lowe's Companies, Inc.
1000 Lowe's Blvd
Mooresville, NC 28117

Entity:	Lowe's Home Centers, LLC Entity ID Number 2515365
Entity Served:	Lowes Home Centers LLC
Title of Action:	Glenda Buchanan vs. Lowes Home Centers LLC
Document(s) Type:	Summons/Complaint
Nature of Action:	Personal Injury
Court/Agency:	Coffee County Circuit Court, TN
Case/Reference No:	2019-CV-45940
Jurisdiction Served:	Tennessee
Date Served on CSC:	05/28/2019
Answer or Appearance Due:	30 Days
Originally Served On:	CSC
How Served:	Certified Mail
Sender Information:	William A. Lockhart 931-723-7997

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | sop@cscglobal.com

COFFEE COUNTY
CIRCUIT COURT

STATE OF TENNESSEE
CIVIL SUMMONS

Case Number
2019-CV-45940

GLENDABUCHANAN. vs. LOWES HOME CENTER LLC

To: Corporation Service Company
2908 Poston Ave.
Nashville, TN 37203-1312

FILED

MAY 13 2019

COPY

CIRCUIT COURT
COFFEE COUNTY, TN
HEATHER HINDS DUNCAN, CLERK
TIME 1:45 PM

You are hereby summoned to defend a civil action filed against you in the Circuit Court of Coffee County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the defendant's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: 5-13-19

H.H. Duncan
Clerk / Deputy Clerk

Attorney for Defendant: WILLIAM A. LOCKHART

200 S. WOODLAND STREET
MANCHESTER, TN 37355

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to _____, Clerk, _____ County

CERTIFICATION (IF APPLICABLE)

I, _____, Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____

Clerk / Deputy Clerk

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows: _____

Date: _____

By: _____
Officer, Title

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on _____, I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant _____. On _____ I received the return receipt, which had been signed by _____ on _____. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: _____

Notary Public / Deputy Clerk (Comm. Expires _____)

Signature of Plaintiff

Plaintiff's Attorney (or Person Authorized to Serve Process)

(Attach return receipt on back)

ADA: If you need assistance or accommodations because of a disability, please call _____, ADA Coordinator, at () _____.

IN THE CIRCUIT COURT FOR COFFEE COUNTY, TENNESSEE

GLEND A BUCHANAN,

Plaintiff,

v.

LOWES HOME CENTERS LLC

Defendant.

FILED

MAY 13 2019

CIRCUIT COURT
COFFEE COUNTY, TN
HEATHER HINDS DUNCAN, CLERK
TIME _____ AM/PM

COPY

Case No.

2019-CV-45940

JURY DEMAND

COMPLAINT

Glenda Buchanan, Plaintiff, for her cause of action against Lowes Home Centers LLC, Defendant, states as follows:

1. Plaintiff, Glenda Buchanan, is a citizen and resident of Coffee County, Tennessee.
2. Defendant, Lowes Home Centers LLC, is a business entity doing business within the State of Tennessee and may be served with process upon the Corporation Service Company which is an agent registered with the State of Tennessee located at 2908 Poston Avenue, Nashville, TN 37203-1312.
3. On or about May 18, 2018 Plaintiff Glenda Buchanan was a business invitee at the Defendant's business located at Lowes, 2211 North Jackson St., Tullahoma, Tennessee 37388.
4. While the Plaintiff was walking down an aisle, used by customers to shop, she tripped due to a box which had been negligently left in the aisle.
5. The employees, agents or managers of the Defendant knew or should have known of the existence of the dangerous and unsafe condition created by the box. The employees, agents, managers, and/or members of the Defendant, Lowes Home Centers LLC, knew or should

have known that the box negligently left in the aisle presented a risk to patrons of the store and that patrons would come into contact with the dangerous condition when the patrons were walking and shopping in the aisle.

6. The Defendant was negligent in failing to safeguard its premises for business invitees. Defendant carelessly and negligently failed to maintain the aisle in proper and safe condition, negligently failed to warn Plaintiff Glenda Buchanan of the dangerous condition, and negligently and carelessly failed to remove, guard, or protect against such dangerous condition.

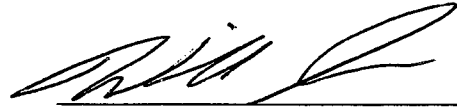
7. As a direct and proximate result of the negligence of the Defendant, the Plaintiff has sustained extensive personal injuries which at this time appear to be permanent and continuing in nature.

8. As a further direct and proximate result of the negligence of the Defendant, the Plaintiff has sustained extensive medical expenses, mental stress, pain and suffering, and other damages resulting from Plaintiff's injuries.

WHEREFORE the Plaintiff, Glenda Buchanan prays for damages against the Defendants, Lowes Home Centers, LLC, in the amount of \$150,000.00 to compensate Plaintiff for her losses; for a jury to try this cause; for all costs of this action; and for all other and further relief to which the Plaintiff may prove entitled.

Dated: 5/13/19.

Respectfully submitted,



Burch & Lockhart
William A. Lockhart #32227
200 S. Woodland Street
Manchester, Tennessee 37388
931-723-7997
Willa.lockhart@gmail.com

Cost Bond

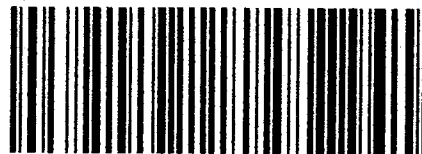
The undersigned hereby acknowledges himself surety for costs in the above cause of action not to exceed \$500.



William A. Lockhart

BURCH & LOCKHART
200 SOUTH WOODLAND STREET
MANCHESTER, TN 37355

CERTIFIED MAIL™



7013 2250 0000 0821 4423

\$6.80⁰
US POSTAGE
FIRST-CLASS

071V00730609
37355
000039459



endicia.com endicia.com endicia.com

Corporation Service Co.
2908 Poston Ave.
Nashville, TN 37203-1312